

FILED

JUL 21 2005

U. S. DISTRICT COURT
E. DISTRICT OF MO.

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No.
)
MARY LOVE, and)
DANNA FRANCE,)
Defendants.)

4 : 06 CR 00462 DJS

INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about March 30, 2004 in the Eastern District of Missouri,

MARY LOVE,

the defendant herein, in a matter within the jurisdiction of the Department of Labor, a department of the United States, did knowingly and willfully make and use a material false writing and document by presenting to the Department of Labor a Form LM-3, knowing the same to be false; that is in the submitted document the defendant alleged that she received total allowances and distributions of \$4,200.00 for the year 2003 from American Federation of Government Employees Local 96 when in fact she received substantially more allowances.

In violation of Title 18, United States Code, Section 1001.

COUNT TWO

The Grand Jury further charges that:

On or about March 29, 2005 in the Eastern District of Missouri,

MARY LOVE,

the defendant herein, in a matter within the jurisdiction of the Department of Labor, a department of the United States, did knowingly and willfully make and use a material false writing and document by presenting to the Department of Labor a Form LM-3, knowing the same to be false; that is in the submitted document the defendant alleged that she received total allowances and distributions of \$5,700.00 for the year 2004 from American Federation of Government Employees Local 96 when in fact she received substantially more allowances.

In violation of Title 18, United States Code, Section 1001.

COUNT THREE

The Grand Jury further charges that:

On or about April 20, 2005, in the Eastern District of Missouri,

MARY LOVE,

the defendant herein, at a place within the special maritime and territorial jurisdiction of the United States, namely Jefferson Barracks and John Cochran VA medical Centers, on land acquired for the use of the United States and under its concurrent jurisdiction, did take and carry away, with intent to steal and purloin, the personal property of another, namely money of the American Federation of Government Employees Local 96 of a value of \$3,000.00.

In violation of Title 18, United States Code, Sections 7(3) and 661.

COUNT FOUR

The Grand Jury further charges that:

On or about June 7, 2005, in the Eastern District of Missouri,

MARY LOVE,

the defendant herein, at a place within the special maritime and territorial jurisdiction of the United States, namely Jefferson Barracks and John Cochran VA medical Centers, on land acquired for the use of the United States and under its concurrent jurisdiction, did take and carry away, with intent to steal and purloin, the personal property of another, namely money of the American Federation of Government Employees Local 96 of a value of \$4,000.00.

In violation of Title 18, United States Code, Sections 7(3) and 661.

COUNT FIVE

The Grand Jury further charges that:

On or about November 5, 2005, in the Eastern District of Missouri,

MARY LOVE,

the defendant herein, at a place within the special maritime and territorial jurisdiction of the United States, namely Jefferson Barracks and John Cochran VA medical Centers, on land acquired for the use of the United States and under its concurrent jurisdiction, did take and carry away, with intent to steal and purloin, the personal property of another, namely money of the American Federation of Government Employees Local 96 of a value of \$1,500.00.

In violation of Title 18, United States Code, Sections 7(3) and 661.

COUNT SIX

The Grand Jury further charges that:

On or about March 30, 2004 in the Eastern District of Missouri,

DANNA FRANCE,

the defendant herein, in a matter within the jurisdiction of the Department of Labor, a department of the United States, did knowingly and willfully make and use a material false writing and

document by presenting to the Department of Labor a Form LM-3, knowing the same to be false; that is in the submitted document the defendant alleged that she received total allowances and distributions of \$3,000.00 for the year 2003 from American Federation of Government Employees Local 96 when in fact she received substantially more allowances.

In violation of Title 18, United States Code, Section 1001.

COUNT SEVEN

The Grand Jury further charges that:

On or about March 29, 2005 in the Eastern District of Missouri,

DANNA FRANCE,

the defendant herein, in a matter within the jurisdiction of the Department of Labor, a department of the United States, did knowingly and willfully make and use a material false writing and document by presenting to the Department of Labor a Form LM-3, knowing the same to be false; that is in the submitted document the defendant alleged that she received total allowances and distributions of \$4,225.00 for the year 2004 from American Federation of Government Employees Local 96 when in fact she received substantially more allowances.

In violation of Title 18, United States Code, Section 1001.

COUNT EIGHT

The Grand Jury further charges that:

On or about April 20, 2005, in the Eastern District of Missouri,

DANNA FRANCE,

the defendant herein, at a place within the special maritime and territorial jurisdiction of the United States, namely Jefferson Barracks and John Cochran VA medical Centers, on land

acquired for the use of the United States and under its concurrent jurisdiction, did take and carry away, with intent to steal and purloin, the personal property of another, namely money of the American Federation of Government Employees Local 96 of a value of \$3,200.00.

In violation of Title 18, United States Code, Sections 7(3) and 661.

COUNT NINE

The Grand Jury further charges that:

On or about August 8, 2005, in the Eastern District of Missouri,

DANNA FRANCE,

the defendant herein, at a place within the special maritime and territorial jurisdiction of the United States, namely Jefferson Barracks and John Cochran VA medical Centers, on land acquired for the use of the United States and under its concurrent jurisdiction, did take and carry away, with intent to steal and purloin, the personal property of another, namely money of the American Federation of Government Employees Local 96 of a value of \$2,250.00.

In violation of Title 18, United States Code, Sections 7(3) and 661.

COUNT TEN

The Grand Jury further charges that:

On or about November 5, 2005, in the Eastern District of Missouri,

DANNA FRANCE,

the defendant herein, at a place within the special maritime and territorial jurisdiction of the United States, namely Jefferson Barracks and John Cochran VA medical Centers, on land acquired for the use of the United States and under its concurrent jurisdiction, did take and carry

away, with intent to steal and purloin, the personal property of another, namely money of the
American Federation of Government Employees Local 96 of a value of \$1,400.00.

In violation of Title 18, United States Code, Sections 7(3) and 661.

A TRUE BILL.

Catherine Hanaway

FOREPERSON

CATHERINE L. HANAWAY
United States Attorney

David M. Rosen

DAVID M. ROSEN #23537
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